

MEMO ENDORSED

LAW OFFICE OF ALI NAJMI

261 MADISON AVENUE, 12TH FLOOR

NEW YORK, NEW YORK 10016

(212) 401-6222

ALI@NAJMILAW.COM

VIA ECF

April 22, 2020

Hon. Kenneth M. Karas
United States District Court Judge
Southern District of New York
300 Quarropas Street
White Plains, NY 10601

RE: USA v. Crossland 7:19 Cr. 645 (KMK) Adjournment Request

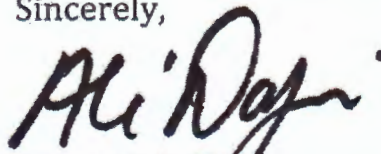
Dear Judge Karas:

This letter is to request the Court to allow myself and my client, Stephen Parente, to adjourn the scheduled appearance by telephone before the Court scheduled for tomorrow to the next day Friday April 24, or any other date the Court chooses.

I am presently engaged in active litigation on Election Law matters in Kings County Supreme Court before Judge Edgar Walker and in administrative hearings at the New York City Board of Elections. I must appear virtually from 10am to possibly until 4pm on these matters tomorrow and unable to appear before Your Honor. These are emergency proceedings which were not previously scheduled. Governor Andrew Cuomo has issued executive orders which changed the petition calendar and hearing and litigation calendar under the Election Law because of the Covid-19 crisis.

I have spoken to AUSA Feinzig on this matter and she has represented to me she has no objection to this request. I waive any speedy trial issues during this adjournment period.

Sincerely,


ALI NAJMI, ESQ.

*Granted. The Court
will hold a conference
on 4/24/20 at
12:30 pm*

SO ORDERED


KENNETH M. KARAS U.S.D.J.

4/23/20